

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette, Craig Lassig, Katie Nelson, Tannen Maury, Stephen Muren, Edward Ou, Timothy Evans, Chris Tuite and The Communications Workers of America, On behalf of themselves and other similarly situated individuals,

Court File No. 20-cv-01302
(WMW/DTS)

Plaintiffs,

v.

City of Minneapolis; Minneapolis Chief of Police Medaria Arradondo, in his individual and official capacity; Minneapolis Police Lieutenant Robert Kroll, in his individual and official capacity; Hennepin County Sheriff David Hutchinson, in his individual and official capacity; John Does 1-10, in their individual and official capacities;

Defendants.

**DECLARATION OF
MATTHEW HOLLIHAN IN
SUPPORT OF HENNEPIN
COUNTY SHERIFF DAVID
HUTCHINSON'S MOTION
FOR SUMMARY
JUDGMENT**

I, Matthew Hollihan, state and affirm as follows:

1. I am the Captain of the Professional Standards Division within the Hennepin County Sheriff's Office ("HCSO"). In that position, I oversee both the Internal Affairs Unit and Employee Development Unit of HCSO.
2. It is the official policy of HCSO and Hennepin County that complaints against deputies be vigorously and immediately investigated and, where misconduct is detected, disciplinary action be taken against the offending deputy if appropriate.

Neither HCSO nor Hennepin County have any official or unofficial policy, custom, or

practice of hiring or retaining deputies who have a history of violence, harassment, or misconduct, unconstitutional or otherwise, against citizens or property.

3. I am not aware of any custom, policy, or practice authorizing or tolerating unconstitutional conduct by deputies. In my capacity as Captain of the Professional Standards Division, I have had no knowledge of any pattern of unconstitutional actions or other misconduct by HCSO deputies.

4. HCSO hires as licensed deputies only those individuals who are licensed by the Minnesota Police Officers Standards and Training Board (“POST”). All applicants for licensed deputy positions are required to undergo a thorough background check by HCSO. Once licensed by POST, all licensed deputies are required to attend 48 hours of in-service training tri-annually to maintain their licenses.

5. In addition to the training required by POST, Hennepin County provides significant supplemental training. When licensed deputies are hired by HCSO, they are required to participate in a minimum of 120 hours of new deputy training. The new deputy training consists of both classroom and hands-on training on topics such as crisis intervention and de-escalation, scenario-based training, standards for detention and arrest, and the use of force including weapons, defensive tactics, handcuffing, and restraints. The new deputy training further focuses on the HCSO Policies and Procedures Manual (the “Manual”). The entire Manual is covered during new deputy training. All HCSO licensed deputies are required to have a working knowledge of the rules and regulations contained in the Manual and to comply with these rules and regulations. The new deputy

training also covers state statutes governing the use of force.

6. As stated above, licensed deputies are required to attend forty-eight hours of in-service training tri-annually to maintain their licenses. The Employee Development Unit of HCSO is certified by POST to provide this continuing peace officer education. HCSO requires its licensed deputies to attend a minimum of sixteen hours of in-service training each year. Topics that are covered during these trainings include standards for detention and arrest, use of force, crisis intervention and mental illness crises, autism, conflict management and mediation, and recognizing and valuing community diversity and cultural differences to include implicit bias.

7. HCSO maintains an Internal Affairs Unit (“IAU”) responsible for investigating allegations of deputy misconduct. The IAU promptly take steps to investigate complaints of deputy misconduct and excessive force.

8. I am aware that the HCSO has disciplined numerous deputies for violation of HCSO policies. I am also aware that the HCSO has suspended deputies and terminated deputies who were determined to have violated HCSO policies.

9. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed pursuant to 28 U.S.C. § 1746 on today’s date November 22, 2022.


Matthew Hollihan